



SEALED

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COUNSEL/PARTIES OF RECORD	
JAN - 7 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

8
 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
 12 Plaintiff,

13 v.

2:13-CR-448-KJD-(CWH)

14 CARLOS LEON CABRALES,
 a.k.a. Miguel Angel Quintero Felix,
 15 a.k.a. "Bolas,"
 JOSE LUIS BARRAGAN,
 16 CARLOS JIMENEZ-MARTINEZ, and
 JUAN CARLOS SILVA,
 17 Defendants.
 18

19 **SEALED BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

20 The United States of America, by and through Daniel G. Bogden, United States Attorney for
 21 the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney, hereby files
 22 the following Bill of Particulars for Forfeiture of Property.

23 This Bill of Particulars for Forfeiture of Property is a clarification of, and is more specific
 24 than, the Forfeiture Allegations of the Criminal Indictment, and the United States hereby gives
 25 notice to the Defendants of this clarification and specificity with this Bill of Particulars concerning
 26 the Forfeiture of Property:

FORFEITURE ALLEGATION ONE
(Conspiracy to Distribute a Controlled Substance, Distribution of a Controlled Substance, and Possession of a Controlled Substance with Intent to Distribute)

1. The allegations of Counts One through Thirteen of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), (2)(C), and (3)(B) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of any felony offense charged in Counts One through Thirteen of this Criminal Indictment,

CARLOS LEON CABRALES, a.k.a. Miguel Angel Quintero Felix, a.k.a. "Bolas,"
JOSE LUIS BARRAGAN,
CARLOS JIMENEZ-MARTINEZ, and
JUAN CARLOS SILVA,

defendants herein, shall forfeit to the United States of America, any firearm or ammunition intended to be used in any violations of Title 21, United States Code, Sections 841(a)(1) and 846:

- a. a Glock, Model 19 handgun, bearing serial number BDK808US;
- b. a .45 caliber, High Standard Crusader handgun, bearing serial number HS1147315;
- c. a 12 gauge, Armscor shotgun, bearing serial number AP214132;
- d. a RomArms, model 99.1, 7.62 caliber rifle, bearing serial number 10984599; and
- e. any and all ammunition

(all of which constitutes "property").

All pursuant to Title 21, United States Code, Sections 841(a)(1) and 846; and Title 18, United States Code, Section 924(d)(1), (2)(C), and (3)(B) and Title 28, United States Code, Section 2461(c).

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1 **FORFEITURE ALLEGATION TWO**
2 **(Conspiracy to Distribute a Controlled Substance, Distribution of a Controlled Substance,**
3 **Possession of a Controlled Substance with Intent to Distribute, and**
4 **Illegal Alien in Possession of a Firearm)**

5 1. The allegations of Counts One through Fourteen of this Criminal Indictment are
6 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant
7 to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

8 2. Upon conviction of any felony offense charged in Counts One through Fourteen of
9 this Criminal Indictment,

10 **CARLOS LEON CABRALES, a.k.a. Miguel Angel Quintero Felix, a.k.a. "Bolas,"**
11 **JOSE LUIS BARRAGAN,**
12 **CARLOS JIMENEZ-MARTINEZ, and**
13 **JUAN CARLOS SILVA,**

14 defendants herein, shall forfeit to the United States of America, any firearm or ammunition involved
15 in or used in any knowing violations of Title 21, United States Code, Sections 841(a)(1) and 846;
16 and Title 18, United States Code, Section 922(g)(5)(A):

- 17 a. a Glock, Model 19 handgun, bearing serial number BDK808US;
18 b. a .45 caliber, High Standard Crusader handgun, bearing serial number
19 HS1147315;
20 c. a 12 gauge, Armscor shotgun, bearing serial number AP214132;
21 d. a RomArms, model 99.1, 7.62 caliber rifle, bearing serial number 10984599; and
22 e. any and all ammunition

23 (all of which constitutes "property").

24 All pursuant to Title 21, United States Code, Sections 841(a)(1) and 846; Title 18, United
25 States Code, Section 922(g)(5)(A); and Title 18, United States Code, Section 924(d)(1) and Title 28,
26 United States Code, Section 2461(c).

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1 **FORFEITURE ALLEGATION THREE**
2 **(Conspiracy to Distribute a Controlled Substance, Distribution of a Controlled Substance, and**
3 **Possession of a Controlled Substance with Intent to Distribute)**

4 1. The allegations of Counts One through Thirteen of this Criminal Indictment are
5 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant
6 to Title 21, United States Code, Section 881(a)(11) and Title 28, United States Code, Section
7 2461(c).

8 2. Upon conviction of any felony offense charged in Counts One through Thirteen of
9 this Criminal Indictment,

10 **CARLOS LEON CABRALES, a.k.a. Miguel Angel Quintero Felix, a.k.a. "Bolas,"**
11 **JOSE LUIS BARRAGAN,**
12 **CARLOS JIMENEZ-MARTINEZ, and**
13 **JUAN CARLOS SILVA,**

14 defendants herein, shall forfeit to the United States of America, any firearm used or intended to be
15 used to facilitate the transportation, sale, receipt, possession, or concealment of property and any
16 proceeds traceable to such property in violations of Title 21, United States Code, Sections 841(a)(1)
17 and 846:

- 18 a. a Glock, Model 19 handgun, bearing serial number BDK808US;
19 b. a .45 caliber, High Standard Crusader handgun, bearing serial number
20 HS1147315;
21 c. a 12 gauge, Armscor shotgun, bearing serial number AP214132; and
22 d. a RomArms, model 99.1, 7.62 caliber rifle, bearing serial number 10984599
23 (all of which constitutes "property").

24 All pursuant to Title 21, United States Code, Sections 841(a)(1) and 846; and Title 21,
25 United States Code, Section 881(a)(11) and Title 28, United States Code, Section 2461(c).
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1 **FORFEITURE ALLEGATION FOUR**
2 **(Conspiracy to Distribute a Controlled Substance, Distribution of a Controlled Substance, and**
3 **Possession of a Controlled Substance with Intent to Distribute)**

4 1. The allegations of Counts One through Thirteen of this Criminal Indictment are
5 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant
6 to Title 21, United States Code, Section 853(a)(1).

7 2. Upon conviction of any felony offense charged in Counts One through Thirteen of
8 this Criminal Indictment,

9 **CARLOS LEON CABRALES, a.k.a. Miguel Angel Quintero Felix, a.k.a. "Bolas,"**
10 **JOSE LUIS BARRAGAN,**
11 **CARLOS JIMENEZ-MARTINEZ, and**
12 **JUAN CARLOS SILVA,**

13 defendants herein, shall forfeit to the United States of America, any property constituting, or derived
14 from, any proceeds obtained, directly or indirectly, as the result of violations of Title 21, United
15 States Code, Sections 841(a)(1) and 846:

- 16 a. a Glock, Model 19 handgun, bearing serial number BDK808US;
17 b. a .45 caliber, High Standard Crusader handgun, bearing serial number
18 HS1147315;
19 c. a 12 gauge, Armscor shotgun, bearing serial number AP214132;
20 d. a RomArms, model 99.1, 7.62 caliber rifle, bearing serial number 10984599;
21 e. any and all ammunition; and
22 f. \$4,979 in United States Currency

23 (all of which constitutes "property").

24 All pursuant to Title 21, United States Code, Sections 841(a)(1) and 846; and Title 21,
25 United States Code, Section 853(a)(1).
26 ...

FORFEITURE ALLEGATION FIVE
(Conspiracy to Distribute a Controlled Substance, Distribution of a Controlled Substance, and Possession of a Controlled Substance with Intent to Distribute)

1. The allegations of Counts One through Thirteen of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a)(2).

2. Upon conviction of any felony offense charged in Counts One through Thirteen of this Criminal Indictment,

CARLOS LEON CABRALES, a.k.a. Miguel Angel Quintero Felix, a.k.a. "Bolas,"
JOSE LUIS BARRAGAN,
CARLOS JIMENEZ-MARTINEZ, and
JUAN CARLOS SILVA,

defendants herein, shall forfeit to the United States of America, any property used, or intended to be used, in any matter or part, to commit, or to facilitate the commission of violations of Title 21, United States Code, Sections 841(a)(1) and 846:

- a. a Glock, Model 19 handgun, bearing serial number BDK808US;
- b. a .45 caliber, High Standard Crusader handgun, bearing serial number HS1147315;
- c. a 12 gauge, Armscor shotgun, bearing serial number AP214132;
- d. a RomArms, model 99.1, 7.62 caliber rifle, bearing serial number 10984599;
- e. any and all ammunition; and
- f. \$4,979 in United States Currency

(all of which constitutes "property").

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1 All pursuant to Title 21, United States Code, Sections 841(a)(1) and 846; and Title 21,
2 United States Code, Section 853(a)(2).

3 Dated this 7th day of January, 2014.
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5 Respectfully submitted,

6 DANIEL G. BOGDEN
United States Attorney

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8 DANIEL D. HOLLINGSWORTH
9 Assistant United States Attorney

PROOF OF SERVICE

I, Michelle C. Lewis, certify that the following individuals were served with copies of the Sealed Bill of Particulars for Forfeiture of Property on January 7, 2014, by the below identified method of service:

US MAIL

Brenda Weksler
Federal Public Defender
411 E. Bonneville Avenue, Ste. 250
Las Vegas, NV 89101
Attorney for Carlos Leon Cabrales


MICHELLE C. LEWIS
Paralegal Specialist